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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11
Case No. 19-23649 (RDD)
Jointly Administered

**DECLARATION OF MARA LEVENTHAL
DATED OCTOBER 14, 2020**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. ("PPLP") (7484), Purdue Pharma Inc. ("PPI") (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Under 28 U.S.C. § 1746, I, Mara Leventhal, declare under the penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. This declaration ("Declaration") is submitted in support of the Raymond Sackler Family's two oppositions filed contemporaneously with this Declaration entitled (1) The Raymond Sackler Family's Opposition to the UCC's Exceptions Motion ("Exceptions Opposition"); and (2) The Raymond Sackler Family's Opposition to the Official Committee of Unsecured Creditors' General Challenges Motion ("General Challenges Opposition").²
2. I am an attorney in good standing admitted to practice in the State of New York, and I am a partner at the law firm of Joseph Hage Aaronson LLC ("JHA"). I make this Declaration based on my own personal knowledge and belief, and upon documents and information available to me as counsel to the Raymond Sackler Family.
3. Certain exhibits attached hereto have been designated as Confidential, Highly Confidential, or Professionals' Eyes Only by one or more parties to this proceeding and are filed under seal pursuant to the *Second Amended Protective Order* entered in these proceedings [ECF No. 1540].
4. Attached hereto as **Exhibit 1** is a true and correct copy of a settlement agreement and release between the State of West Virginia, Purdue Pharma, L.P., Purdue Pharma, Inc., and The Purdue Frederick Company, dated December 15, 2004.
5. Attached hereto as **Exhibit 2** is a true and correct copy of an email from R. Sackler to J. Sackler, dated November 20, 2006, and produced as highly confidential under Bates Number PPLPC057000003694.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motions.

6. Attached hereto as **Exhibit 3** is a true and correct copy of an email from H. Udell to I. Sackler Lefcourt, K. Sackler, Raymond Sackler, and others, dated January 27, 2007, and produced as confidential under Bates Number PPLPC044000010048.

7. Attached hereto as **Exhibit 4** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors, dated October 31, 2007, and produced as confidential under Bates Number PPLPC019000172297 (Produced Natively).

8. Attached hereto as **Exhibit 5** is a true and correct copy of Purdue financials and sales information from 2008-2012, and produced as highly confidential under Bates Number PPLPC031001244649 (Produced Natively).

9. Attached hereto as **Exhibit 6** is a true and correct copy of a Boards of Directors Meetings agenda and backup materials, dated January 11, 2008, and produced as highly confidential under Bates Number PPLP004400663.

10. Attached hereto as **Exhibit 7** is a true and correct copy of Decisions by the Board of Directors of Purdue Pharma Inc., dated January 11 to December 31, 2008, and produced as confidential under Bates Number PPLP004416667.

11. Attached hereto as **Exhibit 8** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc., dated February 8, 2008, and produced as confidential under Bates Number PPLPC019000195607.

12. Attached hereto as **Exhibit 9** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the first quarter of 2008, dated May 16, 2008, and produced as highly confidential under Bates Number PPLP004401169.

13. Attached hereto as **Exhibit 10** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma Inc., dated July 15, 2008, and produced as highly confidential under Bates Number PPLP004367297.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the second quarter of 2008, dated August 8, 2008, and produced as highly confidential under Bates Number PPLP004401342.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the third quarter of 2008, dated November 4, 2008, and produced as highly confidential under Bates Number PPLP004402032.

16. Attached hereto as **Exhibit 13** is a true and correct copy of a collection of Decisions by the Board of Directors of Purdue Pharma Inc., dated January 6 to December 10, 2009, and produced as confidential under Bates Number PPLP004416787.

17. Attached hereto as **Exhibit 14** is a true and correct copy of an attachment affixed to the email, designated as outside professionals' eyes only, marked as **Exhibit 102**.

18. Attached hereto as **Exhibit 15** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the fourth quarter of 2008, dated February 5, 2009, and produced as highly confidential under Bates Number PPLP004402205.

19. Attached hereto as **Exhibit 16** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the first quarter of 2009, dated May 8, 2009, and produced as highly confidential under Bates Number PPLP004402651.

20. Attached hereto as **Exhibit 17** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the second quarter of 2009, dated August 26, 2009, and produced as confidential under Bates Number PPLPC012000236639 (Produced Natively).

21. Attached hereto as **Exhibit 18** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the third quarter of 2009, dated October 19, 2009, and produced as highly confidential under Bates Number PPLP004402982.

22. Attached hereto as **Exhibit 19** is a true and correct copy of Boards of Directors Meetings agenda and backup materials, dated November 3, 2009, and produced as highly confidential under Bates number PPLPUCC9002964468.

23. Attached hereto as **Exhibit 20** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the fourth quarter of 2009, dated February 4, 2010, and produced as highly confidential under Bates Number PPLP004403707.

24. Attached hereto as **Exhibit 21** is a true and correct copy of Decisions by the Board of Directors of Purdue Pharma Inc., dated February 18 to December 14, 2010, and produced as confidential under Bates Number PPLP004417012.

25. Attached hereto as **Exhibit 22** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma Inc., dated April 21, 2010, and produced as confidential under Bates Number PPLP004317547.

26. Attached hereto as **Exhibit 23** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the first Quarter of 2010, dated May 6, 2010, and produced as highly confidential under Bates Number PPLP004404102.

27. Attached hereto as **Exhibit 24** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the second quarter of 2010, dated July 22, 2010, and produced as highly confidential under Bates Number PPLP004404551.

28. Attached hereto as **Exhibit 25** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma Inc., dated July 27, 2010, and produced as confidential under Bates Number PPLP004367018.

29. Attached hereto as **Exhibit 26** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma Inc. for the third quarter of 2010, dated November 3, 2010, and produced as highly confidential under Bates Number PPLP004405460.

30. Attached hereto as **Exhibit 27** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2010, dated February 3, 2011, and produced as highly confidential under Bates Number PPLP004405709.

31. Attached hereto as **Exhibit 28** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma, Inc., dated May 2, 2011, and produced as highly confidential under Bates Number PPLPC012000322426.

32. Attached hereto as **Exhibit 29** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the first quarter of 2011, dated May 20, 2011, and produced as highly confidential under Bates Number PPLP004406032.

33. Attached hereto as **Exhibit 30** is a true and correct copy of a Purdue U.S. 10-year plan presentation, dated June 21, 2011, and produced as highly confidential under Bates Number PPLPC042000023782.

34. Attached hereto as **Exhibit 31** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors for the second quarter of 2011, dated July 21, 2011, and produced as highly confidential under Bates Number PPLP004406466.

35. Attached hereto as **Exhibit 32** is a true and correct copy of a 2012 Budget Submission presentation, dated November 2, 2011, and produced as confidential under Bates Number PPLPUCC003392177.

36. Attached hereto as **Exhibit 33** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the third quarter of 2011, dated November 2, 2011, and produced as highly confidential under Bates Number PPLP004406790.

37. Attached hereto as **Exhibit 34** is a true and correct copy of a Purdue Budget presentation, dated November 2, 2011, and produced as confidential under Bates Number POR172144.

38. Attached hereto as **Exhibit 35** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma, Inc., dated November 9, 2011, and produced as confidential under Bates Number PPLP004366871.

39. Attached hereto as **Exhibit 36** is a true and correct copy of Decisions by the Board of Directors of Purdue, dated January through December 2012, and produced as confidential under Bates Number PPLP004417222.

40. Attached hereto as **Exhibit 37** is a true and correct copy of a Corporate Compliance Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2011, dated January 19, 2012, and produced as highly confidential under Bates Number PPLP004407554.

41. Attached hereto as **Exhibit 38** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2011, dated February 3, 2012, and produced as confidential under Bates Number PPLPC012000362899.

42. Attached hereto as **Exhibit 39** is a true and correct copy of a letter to B. Weinstein from K. Thompson, dated March 8, 2012, and produced as confidential under Bates Number PPLP004428603.

43. Attached hereto as **Exhibit 40** is a true and correct copy of a Combined Financial Statements for the years ended December 31, 2011 and 2010, dated April 11, 2012, and produced as highly confidential under Bates Number PPLPMDL0040000537.

44. Attached hereto as **Exhibit 41** is a true and correct copy of a Compliance Report to the Board of Directors of Purdue Pharma L.P. for the first quarter of 2012, dated April 27, 2012, and produced as highly confidential under Bates Number PPLP004407950.

45. Attached hereto as **Exhibit 42** is a true and correct copy of a Report to the Board of Directors of Purdue Pharma, Inc. regarding the Post CIA Compliance Program, dated July 19, 2012, and produced as highly confidential under Bates Number PPLP004408046.

46. Attached hereto as **Exhibit 43** is a true and correct copy of a 2013 Budget Submission, dated October 2012, and produced as highly confidential under Bates Number PPLPC063000017048.

47. Attached hereto as **Exhibit 44** is a true and correct copy of a Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the third quarter of 2012, dated October 5, 2012, and produced as highly confidential under Bates Number PPLP004408439.

48. Attached hereto as **Exhibit 45** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the third quarter of 2012, dated November 1, 2012, and produced as confidential under Bates Number PPLP004366816.

49. Attached hereto as **Exhibit 46** is a true and correct copy of a Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2012, dated January 2013, and produced as highly confidential under Bates Number PPLP004409357.

50. Attached hereto as **Exhibit 47** is a true and correct copy of Combined Financial Statements for the years ended December 31, 2012 and 2011, dated March 29, 2013, and produced as confidential under Bates Number PPLPC029000544175.

51. Attached hereto as **Exhibit 48** is a true and correct copy of a Boards of Directors Meetings agenda and backup materials, dated April 10, 2013, and produced as confidential under Bates Number PPLP004409601.

52. Attached hereto as **Exhibit 49** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors for the first quarter of 2013, dated April 10, 2013, and produced as highly confidential under Bates Number PPLP004409694.

53. Attached hereto as **Exhibit 50** is a true and correct copy of a 2013 10-Year Plan, dated May 9, 2013, and produced as confidential under Bates Number PPLPC063000003469.

54. Attached hereto as **Exhibit 51** is a true and correct copy of a Purdue Quarterly Report to the Board of Directors of Purdue Pharma, Inc. for the second quarter of 2013, dated July 23, 2013, and produced as confidential under Bates Number PPLPC012000433388.

55. Attached hereto as **Exhibit 52** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc., dated July 25, 2013, and produced as highly confidential under Bates Number PPLP00409783.

56. Attached hereto as **Exhibit 53** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the third quarter of 2013, dated October 28, 2013, and produced as highly confidential under Bates Number PPLP004410506.

57. Attached hereto as **Exhibit 54** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2013, dated January 16, 2014, and produced as highly confidential under Bates Number PPLP004410797.

58. Attached hereto as **Exhibit 55** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the first quarter of 2014, dated May 15, 2014, and produced as highly confidential under Bates Number PPLP004411166.

59. Attached hereto as **Exhibit 56** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the second quarter of 2014, dated August 14, 2014, and produced as highly confidential under Bates Number PPLP004411277.

60. Attached hereto as **Exhibit 57** is a true and correct copy of a presentation, dated November 2014, and produced as confidential under Bates Number PPLP004411368.

61. Attached hereto as **Exhibit 58** is a true and correct copy of an email from J. Sackler to R. Sackler, dated November 15, 2014, and produced as highly confidential under Bates Number RSF_OLK00040227.

62. Attached hereto as **Exhibit 59** is a true and correct copy of a Risk Identification and Mitigation presentation, dated December 1, 2014, and produced as confidential under Bates Number PPLPC032000394439 (Produced Natively).

63. Attached hereto as **Exhibit 60** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2014, dated January 16, 2015, and produced as highly confidential under Bates Number PPLP004411811.

64. Attached hereto as **Exhibit 61** is a true and correct copy of a term sheet for subordinated debt, dated March 22, 2015, and produced as highly confidential under Bates Number RSF00471984.

65. Attached hereto as **Exhibit 62** is a true and correct copy of Combined Financial Statements for the years ended December 31, 2014 and 2013, dated April 1, 2015, and produced as highly confidential under Bates Number POK003285615.

66. Attached hereto as **Exhibit 63** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the first quarter of 2015, dated April 21, 2015, and produced as highly confidential under Bates Number PPLP004412071.

67. Attached hereto as **Exhibit 64** is a true and correct copy of an email from S. Ives to D. Sackler, dated June 28, 2015, and produced as professionals' eyes only/highly confidential under Bates Number RSF_OLK00021303.

68. Attached hereto as **Exhibit 65** is a true and correct copy of an email from S. Ives to D. Sackler, R. Sackler, and J. Sackler, dated July 13, 2015, and produced as professionals' eyes only/highly confidential under Bates Number RSF00471979.

69. Attached hereto as **Exhibit 66** is a true and correct copy of an email from D. Sackler to R. Sackler, S. Ives, and J. Sackler, dated August 13, 2015, and produced as professionals' eyes only/highly confidential under Bates Number RSF_OLK00021534.

70. Attached hereto as **Exhibit 67** is a true and correct copy of a Quarterly Compliance Report to Board of Directors of Purdue Pharma, Inc. for the second quarter of 2015, dated August 20, 2015, and produced as highly confidential under Bates Number PPLP004412152.

71. Attached hereto as **Exhibit 68** is a true and correct copy of a 2016 budget proposal, dated November 30, 2015, and produced as confidential under Bates Number PPLPC063000003207.

72. Attached hereto as **Exhibit 69** is a true and correct copy of a Quarterly Ethics and Compliance Report to the Board of Directors for the third quarter of 2015, dated December 1, 2015, and produced as highly confidential under Bates Number PPLP004412546.

73. Attached hereto as **Exhibit 70** is a true and correct copy of a settlement agreement and general release between the Commonwealth of Kentucky and Purdue Pharma. L.P. and other entities, dated December 18, 2015, and produced under Bates Number PPLPUCC000701839.

74. Attached hereto as **Exhibit 71** is a true and correct copy of profit and loss estimates for the years 2015 to 2016 and produced as highly confidential under Bates Number PPLPC051000265076.

75. Attached hereto as **Exhibit 72** is a true and correct copy of a Boards of Directors Meetings agenda and backup materials, dated January 15, 2016, and produced as confidential under Bates Number PPLP004412586.

76. Attached hereto as **Exhibit 73** is a true and correct copy of a Quarterly Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the fourth quarter of 2015, dated March 9, 2016, and produced as highly confidential under Bates Number PPLP004412818.

77. Attached hereto as **Exhibit 74** is a true and correct copy of Combined Financial Statements for the years ended December 31, 2015 and 2014, dated March 31, 2016, and produced as highly confidential under Bates Number PPLPC011000090527.

78. Attached hereto as **Exhibit 75** is a true and correct copy of a Quarterly Ethics and Compliance Report to the Board of Directors of Purdue Pharma, Inc., dated August 25, 2016 and produced as highly confidential under Bates Number PPLP004413387.

79. Attached hereto as **Exhibit 76** is a true and correct copy of a Quarterly Ethics and Compliance Report to the Board of Directors of Purdue Pharma, Inc. for the third quarter of 2016, dated December 1, 2015, and produced as highly confidential under Bates Number PPLP004413671.

80. Attached hereto as **Exhibit 77** is a true and correct copy of Combined Financial Statements for the years ended December 31, 2016 and 2015, dated March 31, 2017, and produced as confidential under Bates Number PPLPC021000890262.

81. Attached hereto as **Exhibit 78** is a true and correct copy of a Quarterly Ethics and Compliance Report to the Board of Directors, dated March 2017, and produced as highly confidential under Bates Number PPLP004413913.

82. Attached hereto as **Exhibit 79** is a true and correct copy of a Quarterly Ethics and Compliance Report to the Board of Directors of Purdue Pharma, Inc., dated June 2017, and produced as highly confidential under Bates Number PPLP004414244.

83. Attached hereto as **Exhibit 80** is a true and correct copy of an EC Meeting presentation, dated July 25, 2017, and produced as highly confidential under Bates Number PPLPC032000398822.

84. Attached hereto as **Exhibit 81** is a true and correct copy of a Board of Directors Presentation: Ethics & Compliance Update, dated August 2017, and produced as confidential under Bates Number PPLPC021000899767.

85. Attached hereto as **Exhibit 82** is a true and correct copy of a Board of Directors Presentation: Ethics & Compliance Update for the third quarter of 2017, dated October 2017, and produced as highly confidential under Bates Number PPLPC022001020792.

86. Attached hereto as **Exhibit 83** is a true and correct copy of a Board of Directors Presentation: Ethics & Compliance Update, dated December 2017, and produced as confidential under Bates Number PPLPC021000920798.

87. Attached hereto as **Exhibit 84** is a true and correct copy of a Board of Directors Presentation: Ethics & Compliance Update, dated March 2018, and produced as highly confidential under Bates Number PPLP004414932.

88. Attached hereto as **Exhibit 85** is a true and correct copy of a memorandum of understanding regarding a joint defense and common interest agreement between Beacon Trust, Milton Trust, the A-Side Sacklers, A-Side non-Sackler directors, Purdue Pharma L.P., Purdue Pharma Inc., and the Purdue Frederick Company, Inc., dated May 15, 2018, and produced as professionals' eyes only/confidential under Bates Number RSF00484625.

89. Attached hereto as **Exhibit 86** is a true and correct copy of an Ethics & Compliance Update for the Board of Directors of Purdue Pharma, Inc., dated August 10, 2018, and produced as highly confidential under Bates Number PPLP004415061.

90. Attached hereto as **Exhibit 87** is a true and correct copy of a Purdue Pharma Inc. Board of Directors Meetings agenda and backup materials, dated September 13, 2018, and produced as confidential under Bates Number PURDUE-COR-00009574.

91. Attached hereto as **Exhibit 88** is a true and correct copy of Twitter posts (tweets) by various authors, from March 28, 2019 to August 11, 2020.

92. Attached hereto as **Exhibit 89** is a true and correct copy of an engagement letter between Lake Partners Strategy Consultants, Inc. and Joseph Hage Aaronson, dated May 8, 2019, and produced as professionals' eyes only/highly confidential under Bates Number RSF00745233.

93. Attached hereto as **Exhibit 90** is a true and correct copy of an email from D. Goldin to D. Bernick and D. Sackler, dated May 21, 2019, and produced as confidential under Bates Number RSF00460427.

94. Attached hereto as **Exhibit 91** is a true and correct copy of an email from A. Stevens to G. Joseph, M. Leventhal, and others, dated May 27, 2019, and produced as confidential under Bates Number RSF00787604.

95. Attached hereto as **Exhibit 92** is a true and correct copy of an email from C. Boele to G. Joseph, M. Leventhal, and others, dated May 29, 2019, and produced as confidential under Bates Number RSF00787602.

96. Attached hereto as **Exhibit 93** is a true and correct copy of a list of individuals and entities appearing on the September 4, 2020 privilege log, dated September 4, 2020, and designated as outside professionals' eyes only.

97. Attached hereto as **Exhibit 94** is a true and correct copy of a Raymond-side Informational Presentation, dated November 22, 2019, and designated as professionals' eyes only/highly confidential.

98. Attached hereto as **Exhibit 95** is a true and correct copy of an excerpt from of a Presentation of Defenses, dated December 6, 2019 for *In re: Purdue Pharma L.P., et al.*, and designated as professionals' eyes only/highly confidential.

99. Attached hereto as **Exhibit 96** is a true and correct copy of an excerpt of the transcript of Purdue Pharma Presentation of Defenses, dated December 6, 2019.

100. Attached hereto as **Exhibit 97** is a true and correct redacted copy of an email from B. Taylor to C. Stanley, J. McClammy, and others, dated December 14, 2019. Passwords in this document have been redacted.

101. Attached hereto as **Exhibit 98** is a true and correct copy of a letter from K. Fell to M. Huebner, M. Hurley, and others, dated June 19, 2020.

102. Attached hereto as **Exhibit 99** is a true and correct copy of a letter from A. Lees to M. Hurley, dated July 28, 2020.

103. Attached hereto as **Exhibit 100** is a true and correct copy of a letter from A. Lees to M. Hurley, dated July 31, 2020, and designated professionals' eyes only/highly confidential.

104. Attached hereto as **Exhibit 101** is a true and correct copy of an email from K. Fell to K. Porter, A. Lees, and others, dated August 3, 2020.

105. Attached hereto as **Exhibit 102** is a true and correct copy of an email from E. Lilburn to M. Huebner, C. Duggan, and others, dated August 7, 2020.

106. Attached hereto as **Exhibit 103** is a true and correct copy of a letter from A. Lees to M. Hurley, dated August 7, 2020.

107. Attached hereto as **Exhibit 104** is a true and correct copy of an email from M. Grier to M. Huebner, C. Duggan, and others, dated August 7, 2020.

108. Attached hereto as **Exhibit 105** is a true and correct copy of a letter from A. Lees to M. Hurley, dated August 16, 2020.

109. Attached hereto as **Exhibit 106** is a true and correct copy of an email from D. White to M. Huebner, C. Duggan, and others, dated August 17, 2020.

110. Attached hereto as **Exhibit 107** is a true and correct copy of a letter from A. Lees, J. Ball, and others to M. Hurley, dated August 17, 2020, and designated outside professionals' eyes only/highly confidential.

111. Attached hereto as **Exhibit 108** is a true and correct copy of a letter from A. Lees to M. Hurley, dated August 22, 2020.

112. Attached hereto as **Exhibit 109** are excerpts from a true and correct copy of the deposition transcript of D. Sackler, dated August 28, 2020. The excerpts contains portions of the deposition transcript that are confidential and other portions that have been designated professionals' eyes only/highly confidential

113. Attached hereto as **Exhibit 110** is a true and correct copy of a letter from A. Lees to M. Hurley, dated September 2, 2020.

114. Attached hereto as **Exhibit 111** is a true and correct copy of a letter from A. Lees to M. Hurley, dated September 17, 2020.

115. Attached hereto as **Exhibit 112** is a true and correct copy of an email from D. White to M. Huebner, C. Duggan, and others, dated September 21, 2020.

116. Attached hereto as **Exhibit 113** is a true and correct copy of an attachment to the email marked **Exhibit 112**, and designated as outside professionals' eyes only.

117. Attached hereto as **Exhibit 114** is a true and correct copy of an attachment to the email marked **Exhibit 112**, and designated as outside professionals' eyes only (Produced Natively).

118. Attached hereto as **Exhibit 115** is a true and correct copy of excerpts from the deposition transcript of S. Ives, dated September 22, 2020. The excerpts contain portions of the deposition transcript that are confidential and other portions that have been designated outside professionals' eyes only/highly confidential and professionals' eyes only/highly confidential.

119. Attached hereto as **Exhibit 116** is a true and correct copy of a letter from M. Hurley to A. Lees, dated September 22, 2020.

120. Attached hereto as **Exhibit 117** is a true and correct copy of a letter from M. Hurley to A. Lees, dated September 24, 2020.

121. Attached hereto as **Exhibit 118** is a true and correct copy of a letter from A. Lees to M. Hurley, dated September 24, 2020.

122. Attached hereto as **Exhibit 119** is a true and correct copy of a letter from A. Lees to M. Hurley, dated September 28, 2020.

123. Attached hereto as **Exhibit 120** is a true and correct copy of a transcript for an omnibus hearing in *In re Purdue Pharma L.P.*, dated September 30, 2020.

124. Attached hereto as **Exhibit 121** is a true and correct copy of the revised Hurley Exhibit B Exhibit, dated October 14, 2020, and designated as outside professionals' eyes only (Provided Natively).

125. Attached hereto as **Exhibit 122** is a true and correct copy of a list of individuals and entities appearing on the July 22, 2020 privilege log, dated August 17, 2020, and designated as outside professionals' eyes only.

126. Attached hereto as **Exhibit 123** is a true and correct copy of a Mid-year update, dated June 8, 2016, and produced as confidential under Bates Number PPLPC045000018249.

Executed on: October 14, 2020

/s/ Mara Leventhal

Mara Leventhal